IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION Master File No. 2:12-MD-02327 MDL 2327

THIS DOCUMENT RELATES TO ETHICON WAVE CASES

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

CROSS NOTICE OF VIDEOTAPED TRIAL TESTIMONY OF PROF. DR. MED. UWE KLINGE

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the trial testimony of Prof. Dr. Med. Uwe Klinge, will be taken jointly in connection with *In Re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2327* (Wave Cases), United States District Court, Southern

District of West Virginia and *Mullins v. Ethicon, Inc., et al.*, Southern District of West Virginia,

case No. 2:12-MD-02952, upon oral examination on November 4, 2015 at 10:00 a.m. GMT at

Pullman Aachen Quellenhof Hotel, Monheimsallee 52, 52062 Aachen, Germany

PLEASE TAKE FURTHER NOTICE that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Plaintiffs hereby cross-notice this trial testimony for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Plaintiffs further state that this trial examination shall be conducted in accordance with and subject to the

Protective Orders entered *In Re: Ethicon Inc.*, *Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This videotaped trial examination will be taken before a person authorized by law to administer oaths and be recorded by stenograph.

Dated: October 27, 2015

Respectfully submitted,

/s/ Benjamin H. Anderson_

Benjamin H. Anderson Anderson Law Offices 1360 W. 9th Street, Suite 215 Cleveland, Ohio 44113

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CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2015, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

Respectfully submitted,

/s/ Benjamin H. Anderson_

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